

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of

Amanda J. Lee

Debtors.

CHAPTER 13

NO. 20 B 01588

Judge Deborah L. Thorne

NOTICE OF MOTION

TO:

Amanda J. Lee
504 E. Kensington Road, Apt. C
Mount Prospect, IL 60056
Via regular mail

David M. Siegel
Via electronic notification
Marilyn O. Marshall
Via electronic notification

PLEASE TAKE NOTICE that on January 20, 2021, at 1:30 p.m., I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present the motion of Ford Motor Credit Company LLC for relief from the automatic stay, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 9362 1728** and the password is **No password required**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Christopher H. Purcell
112 Cary Street
Cary, Illinois 60013
Shermlaw13@aol.com
Phone: (312) 372-1487

FORD MOTOR CREDIT COMPANY LLC

BY: /s/ Christopher H. Purcell
One of its Attorneys
Sherman & Purcell, LTD.

CERTIFICATE OF SERVICE

I, Christopher H. Purcell, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on January 8, 2021 before the hour of 5:00 p.m.

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MOTION TO MODIFY AUTOMATIC STAY

Now comes Ford Motor Credit Company LLC (hereinafter the “Movant”), a creditor herein, by SHERMAN & PURCEL, LTD., its attorneys, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. The Movant is a secured creditor of the Debtor. The Statement to Accompany Motions for Relief from Stay is attached hereto and incorporated herein including, but not limited to, the description of the collateral.

2. The Debtor has not offered, and Movant. is not receiving, adequate protection for its secured interest or depreciating value. The motor vehicle is not necessary to an effective reorganization by the Debtor. The Movant will suffer irreparable injury, harm and damage should it be delayed in taking possession of the motor vehicle aforesaid and foreclosing its security interest therein and requests that Bankruptcy Rule 4001(a)(3) not apply.

3. The payments to the Trustee were \$1,000 as of the time this motion was drafted. Ford is to be paid through the payments to the trustee and has not received a disbursement since November 20, 2020. This is before adding attorney’s fees and costs.

WHEREFORE, the Movant prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said Movant to take possession of and foreclose its security interest in a certain 2014 Ford Fusion, V.I.N. 3FA6P0RU4ER231816 and for such other and further relief as this Court may deem just.

Christopher H. Purcell
Sherman & Purcell, LTD.

112 Cary Street

Cary, Illinois 60013

Shermlaw13@aol.com

Phone: (312) 372-1487

Attorney for Ford Motor Credit Company LLC

FORD MOTOR CREDIT COMPANY LLC

BY: /s/ Christopher H. Purcell
One of its Attorneys